

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

IN RE:)	
)	
LEBANON PLATINUM, LLC, <i>et al.</i> ,)	Case No. 23-03592 CMW
)	(JOINTLY ADMINISTERED)
)	
Debtors.)	Chapter 11

MOTION FOR DANIEL M. ELIADES TO APPEAR *PRO HAC VICE*

In accordance with Local Rule 2090-1(b), Hilton Franchise Holding LLC, successor in interest to Hampton Inns Franchise LLC (“Hilton”), and HLT Existing Franchise Holding LLC (“HLT” and together with Hilton, the “Hilton Creditors”), creditors in this matter, through its undersigned attorney, who is admitted to practice in the United States District Court for the Middle District of Tennessee and maintains his principal office in Nashville, Tennessee, moves that Daniel M. Eliades of the law firm of K&L Gates LLP, be admitted to appear and practice in this Court as counsel *pro hac vice* for the Hilton Creditors. In support of this Motion, Mr. Eliades certifies as follow:

1. Mr. Eliades is a partner in the law firm of K&L Gates LLP, with its offices located at One Newark Center, 10th Floor, Newark, New Jersey 07102.
2. Mr. Eliades is a member in good standing of the New Jersey and Washington state bars, having been admitted to the New Jersey bar in 1990 and to the Washington bar in 2019. Mr. Eliades’ New Jersey state bar number is 030851990 and his Washington state bar number is 54991. Mr. Eliades is also admitted to practice in the United States Court of Appeals for the Third Circuit and the United States District Court for the following districts: the Central District of Illinois; the

District of Colorado; the Eastern District of Michigan; the Northern District of Florida; the Western District of Michigan; the Western District of Washington; and the Western District of Wisconsin.

3. Mr. Eliades is currently admitted to practice in the United States District Court for the District of New Jersey (among others) as member of its bar. A Certificate of Good Standing for the United States District Court for the District of New Jersey is attached hereto as **Exhibit A**. Mr. Eliades has requested an updated Certificate of Good Standing from the United States District Court for the District of New Jersey and from the Western District of Washington and will provide same to the court once received.

4. Mr. Eliades does not have any disciplinary actions pending against him in any State or Federal Court.

5. Mr. Eliades has read and is familiar with the Federal Rules of Civil Procedure, the Federal Rules of Bankruptcy Procedure and the Local Rules of this Court.

6. The Hilton Creditors have retained Joseph F. Welborn, III, with the law firm of K&L Gates LLP to act as local counsel in this matter.

7. Mr. Eliades requests that he be served with all notices and papers relating to this case.

WHEREFORE, the Hilton Creditors request that this Court enter an Order permitting Mr. Eliades to appear *pro hac vice* in connection with this case.

Dated: October 20, 2023

Respectfully submitted,

K&L Gates LLP

/s/ Joseph F. Welborn, III

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And

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*Attorneys for Hilton Franchise Holding LLC,
successor in interest to Hampton Inns Franchise
LLC, and HLT Existing Franchise Holding LLC*

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of October, 2023, the foregoing was filed electronically with the Clerk's office by using the CM/ECF system and served electronically via ECF to all the parties registered to receive electronic notice in this case.

/s/ Joseph F. Welborn, III

Joseph F. Welborn, III